

# EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

|                                                                                                    |                          |
|----------------------------------------------------------------------------------------------------|--------------------------|
| CARRIE CONLEY, et al.,<br><br>Plaintiffs,<br><br>v.<br><br>ALAN HIRSCH, et al.,<br><br>Defendants. | No. <u>5:25-cv-00193</u> |
|----------------------------------------------------------------------------------------------------|--------------------------|

**DECLARATION OF LOCKHART WEBB**

I, Lockhart Webb, hereby declare that the following is true and correct, is within my personal knowledge, and if called as a witness I am competent to testify thereto.

1. I am a registered North Carolina voter, a United States citizen, over the age of eighteen, and have never been convicted of a felony.
2. I voted in the November 2024 North Carolina general election, including the race for Seat Six on the North Carolina Supreme Court.
3. I was born in Siler City, North Carolina and grew up in Colfax, North Carolina (the property is now part of Kernersville, but still in Guilford County). I attended Greensboro Day School, where my father was a teacher. I was a senior in high school during the 2000 election campaign and spent a great deal of classroom time discussing that contentious election. As a freshman in college, I followed the litigation related to this election, which made me acutely aware of the importance of every single vote.
4. I registered to vote in Guilford County, North Carolina as soon as I turned 18.

5. I voted absentee in Guilford County while I was in college, then lived and voted in a few different states before returning to North Carolina in 2019.

6. In 2019, I registered to vote at the Kernersville Department of Motor Vehicles while obtaining an updated North Carolina Driver's license with my Kernersville, North Carolina address.

7. That North Carolina address is the last place where I resided in the United States.

8. Later that year, I moved to Switzerland, where my husband began a Ph.D. program.

9. I have voted regularly in Guilford County while living overseas, including in primary elections in 2020 and 2024 and in general elections in 2020, 2022, and 2024.

10. I have always voted by submitting a Federal Post Card Application then submitting my ballot through the online portal available to overseas voters.

11. I carefully read the instructions provided by elections officials in requesting, filling out, and casting my ballot and I made sure to follow those instructions so that my vote would count.

12. Neither the instructions to request my overseas ballot nor the instructions to submit my ballot via the online portal directed or prompted me to provide a photocopy of my photo identification.

13. The online portal that I use to vote from overseas, as far as I am aware, did not provide any means for submitting a photocopy of my photo identification along with my ballot.

14. I understand that my vote has been protested by the losing candidate for the Supreme Court election, Jefferson Griffin, and that my vote has been assumed to be invalid for that election. This is distressing to me.

15. I am in the process of moving back to Guilford County, North Carolina with my husband. We are no longer living at the St-Sulpice address on file at the Guilford County Board of Elections, and we will be in transit over the next several weeks.

16. During that process while I am moving, in between consistent housing, and figuring out my plans for returning to North Carolina, it will be difficult for me to correspond with election officials and collect and provide further information.

17. It is very important to me that my lawful ballot be counted in the North Carolina Supreme Court Seat Six election, but I am concerned about how elections officials will provide notification to me about any additional hurdles I must clear in order for my vote in that race to count and about whether I will be able to take newly imposed steps to secure my vote during our transition from Switzerland to North Carolina.

18. I have received no communication from the Guilford County Board of Elections, the North Carolina State Board of Elections, Jefferson Griffin, or the North Carolina Republican Party about Griffin's challenge to my ballot. In fact, I only learned that Griffin was challenging my ballot one week ago, on April 5, from my sister's partner, who works at a voting rights organization in Washington, D.C.

19. Upon hearing this news, I went to the North Carolina State Board of Elections website to look for my name myself. I found my name on the spreadsheet of Griffin Challenged Voters after some difficulty.

20. Seeing my name on that list caused me great anger and distress, as I know I have followed all of the directions provided to me about how to cast my ballot and see it counted.

21. I believe it is important that all American citizens and all North Carolinians participate in our democracy and that all of our voices, including mine, be heard.

22. I believe and understand, as confirmed by the state of North Carolina, that I am an eligible, registered voter and that my vote in the November 2024 election was valid and should be counted.

23. On September 20, 2024, I received an email from Jane Dempsey, an election official in Guilford County, confirming my eligibility to vote as an overseas voter and the process for casting an overseas absentee ballot. That email did not instruct me to provide a photocopy of any ID. A redacted copy is attached as Ex. A.

24. This email from Mrs. Dempsey also included a pdf with further information and instructions for how to transmit my overseas absentee ballot. Those instructions also did not instruct me to provide a photocopy of my ID. It includes the Affirmation of Military or Overseas Voter. A redacted copy of this document is attached as Ex. B.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 14 day of April, 2025, in St-Sulpice, Switzerland.

  
\_\_\_\_\_  
Lockhart Webb